REMARKS

The Examiner is thanked for the comments in the Action and particularly for those in the telephone interview with this practitioner conducted on 07/15/2002. They have helped us considerably in understanding his rationale therein and in drafting this Response thereto.

5   It is our understanding that claims 3-16 and 18-22 remain pending in this application.

As an initial item, a request was recently submitted with the Office to change the customer number associated with this application. We point this out to the Examiner here to minimize any confusion. While there is data under our customer number which may be used to

10   reach the registered practitioner handling this case, more direct contact information has also been included below.

Items 1-8:

We thank the Examiner for handling these. Otherwise, they appear informational in

15   nature and are understood to require no reply.

Item 9:

Claims 3, 5-6, 11, 16, and 18-22 have been rejected under §103 as unpatentable over Motoyama in view of Fukuniochi.

20   As an initial step, we urge characterizing the references and the claimed invention to keep overall perspective. Motoyama teaches a system for <u>translating</u> a document from one language to another. Fukuniochi teaches a <u>translation</u> system having an idiom processing function. Very simplistically put, Applicant's claims are drawn to a user interface comprising a template for <u>variable replacement,</u> from resource files containing <u>pre chosen text data</u> for that purpose.

25   Variable replacement in templates, substituting with already chosen data, is simply not "*translation*" in the context of Motoyama or Fukuniochi.

Motoyama and/or Fukuniochi might be useful to chose the data stored in Applicant's resource files (later used for replacement). But that is simply not important here, a bi-lingual human could just as easily pick the data and probably better and more efficiently. The

30   computerized translation of Motoyama or Fukuniochi presupposes enough translation being needed to make automation worthwhile. Whereas, Applicant's system for variable substitution

actually involves very little translation, per se, and then beforehand. Its resource file for a particular language is typically created (by translating the needed data) just once and then used for repetitive substitution a considerable number of times later.

Turning now to the Action proper, in regard to claim 3 it states that Motoyama teaches:

5 *"a HTML document page translated using a resource dictionary database (file) containing translated words and phrases for replacing variables"*, and this is compared with Applicant's *"a plurality of resource file containing data for replacing said replacement variable"*.

Respectfully, a key distinction has been missed here. Motoyama's file will contain multiple words/phrases for *"translation"*, verses mere single variables for substitution. That is,

10 there will be many ambiguities that have to yet be resolved before translation is complete.

For instance, in the Spanish language the word *"bonita"* is used when saying a girl, woman, or feminine object, such as a blouse, is pretty. The word *"bonito"* is used to say that a masculine object is pretty (e.g., an automobile), but only objects, and never to describe a boy or man. The word *"bonito"* is also used to name a class of fish. A translation program has to handle

15 all of the attendant complexity of phrases like *"Go to Mexico for large bonito!"*. Resolving the ambiguity of whether a fish, an inanimate masculine object, or a male or female person is being spoken of. Thus, Motoyama's file for translation and Applicant's file for substitution will be considerably different in content, as is needed for their respective uses.

Continuing with the Action proper, it states that Motoyama teaches *"dictionary resource*

20 *files indicative of various languages for web page variable replacement"* and this is compared with *"said replacement variable being selectively replaced by data from a selected one of said resource files, each ... [containing an idiomatically-correct] predefined passage of text"*.

But this also shows that the noted distinction has been missed. A *"dictionary"*, in any language, usually contains multiple definitions for the same word or phrase -- *"ambiguities"* as

25 we have put it above. Motoyama and Fukuniochi require intelligence to pick correct definitions, and to further pick just one of those that is best. Motoyama and Fukuniochi have such intelligence elements -- the very gist's of those inventions are computerized manners to provide that. In contrast, Applicant's invention does not require intelligence when merely substituting data into replacement variables. Applicant's invention does not require intelligence because one

30 and only one data unit exists in a particular replacement file for use replacing any particular variable in its template.

Continuing again with the Action proper, two statements are made about what Motoyama does not include (predefined idioms and templates), and rationalizations are provided as to why these are felt obvious. These rationalizations are strained, however. Applying Motoyama or Fukuniochi requires equating a dictionary to a mere collection of one-to-one substitute variables

5 and then equating grammar to the use of a mere a template.

While it would be convenient if human languages were translatable with something like templates, we all know that that is simply not the case. Even languages as linguistically "close" as English and Spanish are too complex for this. Consider the very simple grammar in: "*Mi caro esta bonito -- my car is pretty*", verses "*Mi bonito esta grande -- my fish is big*". Grammar in

10 human languages is not reducible to a template in which variables can be replaced.

In sum, we urge that Motoyama and Fukuniochi do not teach the elements, separately or in combination, which they are relied upon for in the rejection. To further distinguish, we have amended the independent claims to emphasize that Applicant's invention uses variables that are unambiguous replacements, i.e., emphasizing that the invention does not deal with the

15 complexity of dictionaries or grammar.

Regarding claims 5-6, 11, 16, and 18-22, we urge that the same rationale applies. Claims 11 and 21 are amended similarly to claim 3, and all of the other subject claims are dependent from these.

20 **Item 10:**

Claims 4, 7-8, and 14-15 have been rejected under §103 as unpatentable over Motoyama in view of Fukumochi and further in view of Levy.

As regards Motoyama and Fukumochi, we urge that our above remarks have shown these to not teach or reasonably suggest key elements of Applicant's invention, and that they require

25 further elements (intelligent word/phrase selection and placement) that Applicant's invention does not. This leaves Levy to consider.

The Action correctly states that "*Levy teaches a country code, which is indicative of a particular language*" but we urge that what is missed here is how that is used, and that Levy is not being considered as a whole, and that it cannot be reconciled with Motoyama and

30 Fukumochi. Levy teaches storing a plurality of complete displays -- in respective different languages. It does not teach or reasonably suggest replacement with predefined variables in a

template, it teaches the outright substitution of complete predefined pages when a different language is desired. Thus, Levy's storing of pages teaches away from Applicant's more efficient template/replacement scheme (storing pluralities of pages in pluralities of languages is a key problem that Applicant's invention overcomes) and Levy's storing of predefined pages cannot be

5   reconciled with Motoyama's and Fukumochi's translation to construct an end result.

Item 11:

Claims 9-10, 12-13 have been rejected under §103 as unpatentable over Motoyama in view of Fukumochi and further in view of BERG.

10   Again, as regards Motoyama and Fukumochi, we urge that our above remarks have shown these to not teach or reasonably suggest key elements of Applicant's invention. We further urge that BERG does not rectify this deficiency in these dependent claims of parent claims 3 and 11.

15   **Item 12 (Response to Arguments):**

We thank the Examiner for the reasoned comments here. They have helped us appreciate where past communications have failed in detail, and thus in persuasiveness. Indirectly, all of our above remarks are in response to this.

20   **Items 13-15:**

These appear informational in nature and are understood to require no reply.

CONCLUSION

25   Attached hereto is a marked-up version of the changes made by the current amendment, with all pages captioned "**Version with markings to show changes made.**"
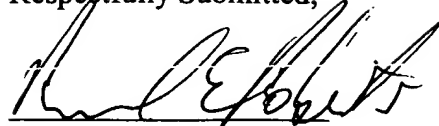
Applicant has endeavored to put this case into complete condition for allowance. It is thought that the §103 rejections have been addressed by amendment or have been completely rebutted. Applicant therefore asks that all objections and rejections now be withdrawn and that

30   allowance of all claims presently in the case be granted.

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Version with markings to show changes made.

3. (Three times amended) A user interface, comprising:

a markup-language encoded template having a replacement variable within; and

a plurality of resource files containing data for replacing said replacement variable, said replacement variable being selectively replaced by data from a selected one of said resource files, each of the plurality of said resource files containing an idiomatically-correct predefined passage of text in a different language such that said replacement variable will be <u>unambiguously</u> replaced with [an idiomatically-correct-predefined] <u>a respective said</u> passage of text [in a language] governed by the selection of [the selected] <u>a particular</u> one of said resource files.

4. (Twice amended) The user interface of claim 3, wherein:

[a] <u>said</u> particular one of [the plurality of] said resource files is selected according to a language code.

11. (Twice Amended) A method for constructing a web based user interface, comprising:

providing an HTML template to a server, said HTML template including at least one variable;

providing a plurality of data files to the server, each of said [plurality of] data files having therein a different language data portion corresponding to said variable, the data portion comprising idiomatically-correct predefined content;

selecting one of said plurality of data files; and

constructing an HTML encoded user interface file by <u>unambiguously</u> substituting the data portion from the selected one of said plurality of data files into said HTML template to replace said variable.

21. (Three times amended) A computer program product comprising a computer usable medium having a computer readable code embodied thereon configured to operate on a computer, comprising:

a markup-language encoded template having a replacement variable within; and

a plurality of resource files containing data for replacing said replacement variable, said replacement variable being selectively replaced by data from a selected one of said resource

files, each of the plurality of said resource files containing an idiomatically-correct predefined passage of text in a different language such that said replacement variable will be <u>unambiguously</u> replaced with [an idiomatically-correct predefined] <u>a respective said</u> passage of text [in a language] governed by the selection of [the selected] <u>a particular</u> one of said resource files.